

has had ample opportunity to devise an appropriate cost study and should not be permitted to rework the study more to its liking.

The record in the present case does not provide a basis for finding that there would be a material cost effect if the study were to undergo revision. In any event, Ameritech Michigan was aware that the issue of using shared transport for intraLATA toll calling would be decided and could have taken that issue into account when it developed its study, but it did not. There is no reason to prolong this case with further cost study revisions.

If Ameritech Michigan can demonstrate that reflecting LATA-wide calling patterns in the tandem switching and transport mileage inputs of its current cost studies, as approved in Case No. U-11831 and this case, would in fact have a material effect on ULS-ST costs, it may file an application to approve a modified ULS-ST cost study within 30 days. However, the modifications must be limited to the cost effects of non-local LATA-wide calling on shared transport, and Ameritech Michigan may not change the cost assumptions or study methodology in other respects that differ from those approved in Case No. U-11831 and this case. Pending Commission action on an application by Ameritech Michigan, Ameritech Michigan must proceed to implement immediately the rates, terms, and conditions of ULS-ST that are approved in this order. An application to approve a modified ULS-ST cost study that fails to demonstrate a substantial basis for making a material modification to the cost findings of this order may be subject to sanctions under MCL 484.2209; MSA 22.1469(209).

Operator Services and Directory Assistance

In the UNE Remand Order, the FCC determined that if an ILEC provides customized routing that enables CLECs to obtain access to competitive operator services and directory assistance (OS/DA), the ILEC would no longer be required to provide unbundled access to its own OS/DA services.<sup>5</sup> 15 FCCR at 3890-904, paras. 438-64. The FCC found that there was a wholesale market providing competitive alternatives to ILECs' own OS/DA services and that many CLECs were self-providing their OS/DA or were routing OS/DA calls to third-party OS/DA providers. However, the FCC further provided that if the ILEC does not offer customized routing to afford access to competitive OS/DA, the ILEC must continue to provide OS/DA as a UNE.<sup>6</sup> UNE Remand Order at 3902-03, paras. 462-63.

In this case, the PFD recommends that the Commission reject Ameritech Michigan's request to discontinue providing its OS/DA on an unbundled basis at rates based on total service long run incremental cost (TSLRIC). The ALJ reasoned that the arrangements Ameritech Michigan offers for routing OS/DA calls to a CLEC's own OS/DA facilities or to a third party's OS/DA platform are not competitive relative to Ameritech Michigan's wholesale OS/DA service. In particular, the ALJ cited the

---

<sup>5</sup>The FCC required OS/DA unbundling in Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, First Report and Order, 11 FCCR 15499 (1996).

<sup>6</sup>The UNE Remand Order explains how customized routing works as follows:

Customized routing permits requesting carriers to designate the particular outgoing trunks associated with unbundled switching provided by the incumbent, which will carry certain classes of traffic originating from the requesting provider's customers. This feature would allow the requesting carrier to specify that OS/DA traffic from its customers be routed over designated trunks which terminate at the requesting carrier's OS/DA platform or a third party's OS/DA platform.

15 FCCR at 3891 n.867.

cost of requiring CLECs to establish dedicated trunk facilities connecting each end office they serve to their OS/DA platform. The ALJ did not specifically direct Ameritech Michigan to implement the CLECs' preference for using shared transport facilities to aggregate OS/DA traffic at tandem switches, but he did indicate that Ameritech Michigan could overcome technical obstacles posed by this alternative or implement other solutions on a feasible basis. The ALJ also stated that it would be reasonable to require Ameritech Michigan to demonstrate the operational feasibility of its arrangements for routing calls to third-party OS/DA providers before freeing Ameritech Michigan from the obligation to unbundle OS/DA.

In its exceptions, Ameritech Michigan argues that the Commission accepted its position on OS/DA in the January 4, 2001 order in Case No. U-12320 addressing the UNE platform (UNE-P). According to Ameritech Michigan, the order implicitly found that wholesale OS/DA services are available on a competitive basis, that Ameritech Michigan has no obligation to charge TSLRIC-based rates, and that it does offer customized routing for alternative OS/DA services, as required by the FCC's UNE Remand Order. Ameritech Michigan further argues that the UNE Remand Order does not require an ILEC that provides customized routing to prove further that there is a viable market for competitive OS/DA services.

Ameritech Michigan contends that the CLEC intervenors' complaint is not that Ameritech Michigan fails to provide a workable type of customized routing, but that it does not provide the type of routing they want. Ameritech Michigan explains that customized routing enables the end office switch to route an incoming OS/DA call to the appropriate trunk. In acknowledging that some CLECs want to use shared

transport facilities to aggregate OS/DA traffic at tandem switches for routing to an OS/DA trunk, Ameritech Michigan claims that its shared transport facilities cannot accommodate OS/DA calling due to an incompatible OS/DA signaling protocol. Ameritech Michigan says that its own OS/DA traffic is subject to the same technical constraints and that it transports this traffic with separate trunks connecting its end offices with its OS/DA facilities. Ameritech Michigan states that no SBC-affiliated ILEC has the capability to provide the routing requested in this case and that it is not aware of any other ILEC that can do so. Ameritech Michigan says that the customized routing arrangements it proposes are the same as those found acceptable by the FCC in the Kansas/Oklahoma 271 Order. However, Ameritech Michigan notes that a CLEC has the option of using the bona fide request procedure to request other types of routing.

AT&T, WorldCom, and the Staff argue that Ameritech Michigan has not provided customized routing that would make competing OS/DA accessible and therefore it does not meet the FCC's conditions for removing OS/DA from UNE status. They suggest that a customized routing alternative that is not feasible or cost effective is not truly available for purposes of the UNE Remand Order. They also dispute Ameritech Michigan's contention that the order in Case No. U-12320 resolved the OS/DA unbundling issue. AT&T says that the order indicates only that the Commission would accept Ameritech Michigan's commitment to continue to provide for OS/DA in its tariffs. WorldCom says that the order accepted Ameritech Michigan's proposal to charge market-based OS/DA rates pursuant to tariff, but that it did not address whether Ameritech Michigan must concurrently maintain a TSLRIC-based OS/DA tariff.

AT&T claims that the restrictive type of customized routing described in Ameritech Michigan's ULS-ST tariff is not usable from an operational standpoint, primarily because it requires each CLEC to establish a separate trunk connection to every end office it serves. Noting that there are approximately 165 end offices in Ameritech Michigan's service territory, AT&T questions whether the proliferation of trunks necessary for each CLEC to provide retail OS/DA services is possible from an engineering standpoint. WorldCom says that Ameritech Michigan did not point to any CLEC that currently uses customized routing for OS/DA traffic in Michigan. AT&T and the Staff say that the Kansas/Oklahoma 271 Order did not address the issue of whether an ILEC must grant a CLEC's request to provide customized routing at the tandem switch and allow the use of shared transport to carry OS/DA calls to the tandem. AT&T generally objects to any unnecessary restrictions on using shared transport in connection with customized routing.

WorldCom's primary objection is that the signaling protocol used on Ameritech Michigan's network for OS/DA calling is incompatible with WorldCom's facilities using Feature Group D. WorldCom argues that Ameritech Michigan cannot meet the conditions of the UNE Remand Order until it resolves the signaling incompatibility.

WorldCom further argues that even if Ameritech Michigan were to comply with the UNE Remand Order, the MTA would continue to require unbundled OS/DA. WorldCom says that this requirement is part of the obligation to provide unbundled port components in Section 355(1), MCL 484.2355(1), MSA 22.1469(355)(1), which, as defined in Section 102(x), MCL 484.2102(x); MSA 22.1469(102)(x), includes "access to directory assistance [and] operator services." WorldCom notes

that the Commission relied upon the MTA's unbundling authority in requiring Ameritech Michigan to provide common transport in the January 28, 1998 order in Case No. U-11280 and cites other orders to similar effect.

As an initial matter, the Commission clarifies that Ameritech Michigan has misread the January 4, 2001 order in Case No. U-12320 with respect to OS/DA. At page 10 of the order, the Commission briefly noted that Ameritech Michigan had made some concessions on disputed issues, including the tariff requirement for OS/DA. The Commission also noted that Ameritech Michigan was not conceding "that OS/DA pricing will be TSLRIC-based." By accepting Ameritech Michigan's commitment to file an OS/DA tariff, the Commission made no findings regarding whether Ameritech Michigan was under a continuous obligation to offer OS/DA as a UNE at TSLRIC-based rates.

The record supports the ALJ's finding regarding the infeasibility and limited usefulness of the customized routing that Ameritech Michigan proposes to accommodate the CLECs' OS/DA requirements. The record indicates that providing this type of customized routing as the only alternative to purchasing Ameritech Michigan's wholesale OS/DA services at market prices (set by Ameritech Michigan) would require each CLEC to establish dedicated trunks to every end office it serves. The Commission finds that this alternative would be costly, inefficient, and burdensome. As WorldCom also notes, there are technical obstacles related to incompatible signaling protocols. The Commission further agrees with WorldCom that it has authority under the MTA to require OS/DA to be offered on an unbundled basis and to ensure reasonable access to competitive alternatives.

Ameritech Michigan has interpreted the customized routing conditions of the UNE Remand Order as requiring less of it than the FCC intended. The justification that the FCC provided for changing its approach was that competitive OS/DA had become widely available on a national basis and could be readily accessed if the ILEC provided appropriate customized routing arrangements. However, the FCC did not suggest that an ILEC could arbitrarily implement any form of customized routing it desired, without regard to whether that arrangement provided meaningful access to competitive OS/DA alternatives. The FCC emphasized instead that “customized routing is necessary to access alternative sources of OS/DA for competitors not deploying their own switches,” and that “[l]ack of a customized routing solution that enables competitors to route traffic to alternative OS/DA providers would therefore effectively preclude competitive LECs from using such alternative providers.” UNE Remand Order, 15 FCCR at 3902, para. 462.

This concern is also apparent in the FCC’s discussion of the substantial cost of reconciling WorldCom’s Feature Group D signaling with other systems used by ILECs, a difficulty that WorldCom raises in this case. SBC had taken the position in the UNE Remand case that customized routing of Feature Group D was not technically feasible for all end-office switches. The FCC concluded that it would “require incumbent LECs, to the extent they have not accommodated technologies used for customized routing, to offer OS/DA as an unbundled network element.” *Id.*, 15 FCCR at 3903, para. 463. The significance of the point, in this Commission’s view, is that the FCC did not regard technical issues as problems for the CLECs alone to address entirely at their own expense. Instead, the FCC

directed both parties to attempt to devise technical solutions and, failing that, it required the ILEC to make OS/DA available as a UNE.

The Commission finds that Ameritech Michigan must continue to offer OS/DA as a UNE at TSLRIC-based rates. The obligation to provide unbundled OS/DA will continue in effect until Ameritech Michigan provides reasonable accommodations for the problems presented by dedicated end-office trunking and other technological issues that inflate the CLECs' cost of obtaining access to competitive OS/DA services. When Ameritech Michigan believes that it meets the requirements relating to providing access to competitive OS/DA services, it may file an application for authorization to remove OS/DA from its list of UNEs. However, it may not remove OS/DA from UNE status without prior Commission authorization.

#### Transiting

Ameritech Michigan defines transiting as providing CLECs with the capability of routing their outbound calling over shared transport facilities that connect Ameritech Michigan switches to switches belonging to other carriers. Although Ameritech Michigan's ULS-ST tariff makes transiting available, Ameritech Michigan claims that it is not obligated to provide transiting, but that it is providing the service voluntarily. The alternative to transiting would be for CLECs to use dedicated trunks to route calls to non-Ameritech Michigan switches. The CLEC parties dispute that transiting is voluntary.

The ALJ interpreted the FCC's rules and orders to obligate Ameritech Michigan to provide transiting over existing transport facilities. The ALJ stated that an opposite conclusion would contradict



the principle that unbundling requires an ILEC to provide other carriers with nondiscriminatory access to the same facilities that it uses to provide service to its own customers.

Ameritech Michigan argues that the FCC's rule defining shared transport, 47 CFR 51.319(d)(1)(ii), precludes mandatory transiting. The rule defines shared transport as unbundled access to "transmission facilities shared by more than one carrier, including the incumbent LEC, between end office switches, between end office switches and tandem switches, and between tandem switches, in the incumbent LEC network." Ameritech Michigan contends that facilities linking one of its switches with another carrier do not qualify under this definition, a point it says the FCC clarified by stating that "incumbent LECs must offer only dedicated transport, and not shared transport, between their switches, or serving wire centers, and requesting carriers' switches." Third Reconsideration Order, 12 FCCR at 12478, para. 28.

Ameritech Michigan also argues that Section 201(2) of the MTA, MCL 484.2201; MSA 22.1469(201), requires the Commission to adhere to federal law. However, Ameritech Michigan states that it has no present intention to discontinue transiting.

WorldCom argues that federal law does not support Ameritech Michigan's position regarding transiting. WorldCom asserts that the Third Reconsideration Order deals with transport links connecting an ILEC's switch with a CLEC's switching facilities and not a situation in which the CLEC subscribes to the ILEC's unbundled local switching for its switching functions. WorldCom says that transiting does not transport calls to the "requesting carrier" referenced in the Third Reconsideration Order, but that it provides a requesting CLEC with a transport link from the ILEC's switching facilities to a third-party carrier. WorldCom says that, in defining shared transport to include transport links "between end office

switches, between end office switches and tandem switches, and between tandem switches, in the incumbent LEC network,” the FCC did not make an exception for ILEC-owned trunks that transport calls to the switches of other carriers. WorldCom notes that 47 CFR 51.315(b) prohibits an ILEC from separating UNEs that are already combined. WorldCom and AT&T argue that it would be discriminatory within the meaning of federal and state law if Ameritech Michigan were to withhold unbundled access to the facilities that it uses to transit its own traffic to other carriers.

WorldCom and AT&T argue that the MTA authorizes the Commission to require transiting. WorldCom says that this requirement is part of the unbundling obligations in Section 355(1). WorldCom and AT&T argue that Section 201 of the MTA does not confine the Commission to enforcing only those requirements approved by the FCC, but that it empowers the Commission in broad terms to “exercise its jurisdiction and authority consistent with” the MTA and federal law. MCL 484.2201(2); MSA 22.1469(201)(2). AT&T argues that federal law does not preempt competitive requirements imposed under the MTA if they do not conflict with FCC rules or federal policies. AT&T cites prior arbitration orders dated November 26, 1996 in Cases Nos. U-11151 and U-11152, at 12, and November 20, 2000 in Case No. U-12465, at 8, as requiring Ameritech Michigan to provide transiting.

The Commission finds that Ameritech Michigan’s attempt to treat transiting as a voluntary offering is without merit. Although Ameritech Michigan advances no reason why it might limit transiting, there is the potential that it could attempt to do so out of a desire to inhibit competition at some point in the future. Notwithstanding Ameritech Michigan’s reliance on FCC pronouncements, a reading of the Third Reconsideration Order does not persuade the Commission that the FCC meant to address transiting in

clarifying which types of transport links must be provided as shared or dedicated transport. Moreover, nothing in 47 CFR 51.319(d) forecloses the Commission from imposing a transiting requirement under the MTA. Transiting is consistent with the FCC's principle that CLECs should have shared access to the same transport facilities that Ameritech Michigan uses for its own traffic. Third Reconsideration Order, 12 FCCR at 12474-75, para. 22. This consistency is all that is required by Section 201(2) of the MTA. It encompasses the facilities that Ameritech Michigan ordinarily uses to transmit calls that require termination with other facilities-based carriers. The same principle is reflected in the MTA's unbundling requirements. The Commission reaffirms its earlier rulings regarding transiting in arbitration cases.

#### Reciprocal Compensation

Ameritech Michigan seeks to incorporate a reciprocal compensation arrangement in its ULS-ST tariff that would require it and the exchanging CLEC to pay the same, or symmetrical, rates to each other. Ameritech Michigan argues that symmetrical rates are mandatory in 47 CFR 51.711, that Commission orders also impose symmetrical rate arrangements, and that there can be no difference between a CLEC's and Ameritech Michigan's costs in exchanging traffic when the CLEC is using Ameritech Michigan's UNEs. As an alternative, WorldCom suggests that the tariff provide an option for CLECs using the UNE-P to account for reciprocal compensation with Ameritech Michigan on a bill-and-keep basis.

The Commission rejects Ameritech Michigan's exception. The rates that another carrier charges in a reciprocal compensation arrangement with Ameritech Michigan are not a proper function of Ameritech Michigan's tariff. By the same token, it is not permissible for Ameritech Michigan to impose conditions in

its tariff that relate to the local termination rates charged by other carriers. Because reciprocal compensation arises from the interconnection of two carriers, a symmetrical rate structure is appropriately addressed in interconnection and arbitration proceedings.

#### Contract Language

AT&T proposes contract language to incorporate the determinations made in this order into its interconnection agreement with Ameritech Michigan, which the Commission arbitrated in the November 20, 1999 order in Case No. U-12465. The Commission does not address AT&T's proposed contract language, which is beyond the scope of this case. Parties to interconnection agreements in which disputed issues were deferred to generic cases should incorporate this order's determinations on those issues in accordance with the directive set forth in the March 7, 2001 order in Case No. U-12465, at 5.

The Commission FINDS that:

- a. Jurisdiction is pursuant to 1991 PA 179, as amended, MCL 484.2101 et seq.; MSA 22.1469(101) et seq.; the Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 USC 151 et seq.; 1969 PA 306, as amended, MCL 24.201 et seq.; MSA 3.560(101) et seq.; and the Commission's Rules of Practice and Procedure, as amended, 1992 AACSR 460.17101 et seq.
- b. Ameritech Michigan's application should be approved except as modified by this order.

THEREFORE, IT IS ORDERED that Ameritech Michigan shall file the tariff sheets necessary to comply with this order within ten days.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26; MSA 22.45.

MICHIGAN PUBLIC SERVICE COMMISSION

( S E A L )

/s/ Laura Chappelle  
Chairman

By its action of March 19, 2001.

/s/ David A. Svanda  
Commissioner

/s/ Dorothy Wideman  
Its Executive Secretary

/s/ Robert B. Nelson  
Commissioner

The Commission FINDS that:

a. Jurisdiction is pursuant to 1991 PA 179, as amended, MCL 484.2101 et seq.; MSA 22.1469(101) et seq.; the Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 USC 151 et seq.; 1969 PA 306, as amended, MCL 24.201 et seq.; MSA 3.560(101) et seq.; and the Commission's Rules of Practice and Procedure, as amended, 1992 AACCS, R 460.17101 et seq.

b. Ameritech Michigan's application should be approved except as modified by this order.

THEREFORE, IT IS ORDERED that Ameritech Michigan shall file the tariff sheets necessary to comply with this order within ten days.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26; MSA 22.45.

MICHIGAN PUBLIC SERVICE COMMISSION

---

Chairman

By its action of March 19, 2001.

---

Commissioner

---

Its Executive Secretary

---

Commissioner

In the matter of the application of )  
AMERITECH MICHIGAN for approval of )  
a shared transport cost study and resolution )  
of disputed issues related to shared transport. )  
\_\_\_\_\_ )

Case No. U-12622

Suggested Minute:

“Adopt and issue order dated March 19, 2001 granting an application by Ameritech Michigan for approval of a shared transport cost study and setting rates, terms, and conditions for making shared transport with unbundled local switching available as an unbundled network element, as set forth in the order.”



JDW-4

Webber, James

---

**From:** OSULLIVAN, MICHAEL J. (AIT) [mo8258@sbc.com]  
**Sent:** Friday, April 27, 2001 8:59 AM  
**To:** Webber, James  
**Cc:** Bennett, Bruce; Cegelski, Mary; Webber, James; MCCRARY,  
**Subject:** RE: Shared Transport in Michigan  
Jim:

CoreComm can route its intralata toll traffic over shared transport in Michigan by using CK 9999 and LPIC AIT. This will allow both manual and flow-through orders to be processed and billed.

Michael J. O'Sullivan  
SBC/Ameritech  
Account Manager  
Office: 614/751-0200  
Fax: 614/751-0201  
Pager: 888/255-8918  
e-mail: michael.j.osullivan@msg.ameritech.com

-----Original Message-----

**From:** Webber, James [mailto:James.Webber@corecomm.com]  
**Sent:** Thursday, April 19, 2001 5:10 PM  
**To:** OSULLIVAN, MICHAEL J. (AIT)  
**Cc:** Bennett, Bruce; Cegelski, Mary; Webber, James  
**Subject:** Shared Transport in Michigan

Mike,

Now that the Michigan Tariff and Interconnection Agreement both allow CoreComm to use Ameritech's shared transport for UNE-P based intraLATA toll traffic in, I'd like to know how, from an operational perspective, CoreComm avails itself of this new option.

That is, (1) how do we ensure our UNE-P based intraLATA toll traffic is carried end to end within Ameritech's network at UNE rates within the state of Michigan? And, (2) should we send conversion orders identifying Ameritech as the intraLATA PIC with your CIC of 9999, or is there another protocol?

Please provide a written response to both Mary and I within 7 days so that we don't send this request again.

Thanks.

JDW

CONFIDENTIALITY NOTICE: This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If the reader of

this message is not the intended recipient, you are hereby notified that you are strictly prohibited from printing, storing, disseminating, distributing or copying this communication. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer.


Thank You  
CoreComm Ltd.

**STATE OF ILLINOIS  
BEFORE THE ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission	:	
On Its Own Motion	:	
-vs-	:	Docket No. 00-0700
Illinois Bell Telephone Company	:	
	:	
Investigation into tariff providing unbundled	:	
local switching with shared transport	:	

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the Rebuttal Testimony of James D. Webber was served upon the parties listed on the attached Service List by electronic distribution and/or regular U.S. mail, postage prepaid, this 11th day of May, 2001.

  
Thomas J. O'Brien

Sean R. Brady  
Office of General Counsel  
Illinois Commerce Commission  
160 N. LaSalle St., Suite C-800  
Chicago, IL 60601-3104

Jonahan E. Canis  
Atty. for Z-Tel Communications, Inc.  
Kelley Drye & Warren  
1200 19th St., N.W., Suite 500  
Washington, DC 20036

Patrick N. Giordano  
Atty. for Global Crossing Local Services, Inc.  
Giordano & Associates, LTD  
55 E. Monroe, Suite 3040  
Chicago, IL 60603

Chris Graves  
Case Manager  
Illinois Commerce Commission  
527 E. Capitol Ave.,  
Springfield, IL 62701

Cheryl Hamill  
AT&T Communications of Illinois, Inc.  
222 W. Adams St.  
Suite 1500,  
Chicago, IL 60606

Michael B. Hazzard  
Atty. for Z-Tel Communications, Inc.  
Kelley Drye & Warren, LLP  
1200 19th St., NW, 5th Floor  
Washington, DC 20036

Theresa P. Larkin  
Illinois Bell Telephone Company  
555 E. Cook St., Fl. 1E  
Springfield, IL 62721

Nora A. Naughton  
Office of General Counsel  
Illinois Commerce Commission  
160 N. LaSalle St., Suite C-800  
Chicago, IL 60601

Paul G. Neilan  
Atty. for Global Crossing Local Services, Inc.  
Giordano & Associates, LTD.  
55 E. Monroe St., Suite 3040  
Chicago, IL 60603

David Nixon  
Office of General Counsel  
Illinois Commerce Commission  
State of Illinois Building, 160 N. LaSalle  
Suite C-800  
Chicago, IL 60601-3104

Julie VanderLaan  
Illinois Commerce Commission  
527 E. Capitol Ave.  
Springfield, IL 62701

Patrick Phipps  
Illinois Commerce Commission  
527 E. Capitol Ave.  
Springfield, IL 62701

Kenneth A. Schiffman  
Sprint Communications Company L.P.  
8140 Ward Parkway, 5E  
Kansas, MO 64114

Louise A. Sunderland  
Ameritech Illinois  
Floor 25D  
225 W. Randolph,  
Chicago, IL 60601

Darrell Townsley  
State Regulatory & Governmental Affairs  
WorldCom, Inc.  
205 N. Michigan Ave., Suite 3700  
Chicago, IL 60601

Ron Walters  
Regional Vice President  
Z-Tel Communications, Inc.  
601 S. Harbour Island Blvd.,  
Tampa, FL 33602

Nancy Wells  
AT&T Communications of Illinois, Inc.  
Floor 3  
913 South Sixth St.,  
Springfield, IL 62703

Donald L. Woods  
Hearing Examiner  
Illinois Commerce Commission  
527 East Capitol Ave.,  
Springfield, IL 62706

J Tyson Covey  
Atty for Ameritech Illinois  
Mayer, Brown & Platt  
190 S. LaSalle St.,  
Chicago, IL 60603-3441

Joseph E. Donovan  
Atty for ALTS  
O'Keefe, Ashenden, Lyons & Ward  
30 N. LaSalle St., Suite 3040  
Chicago, IL 60602

Nancy J. Hertel  
Ameritech Illinois  
225 W. Randolph St., Floor 25D  
Chicago, IL 60606

Henry T. Kelly  
Atty for ALTS  
O'Keef, Ashenden, Lyons & Ward  
30 N. LaSalle St., Suite 3040  
Chicago, IL 60602

Craig A. Newby  
Atty for Ameritech Illinois  
Mayer, Brown & Platt  
190 S. LaSalle St.,  
Chicago, IL 60603-3441

Christy Strawman  
Ameritech Illinois  
225 W. Randolph St., Floor 25D  
Chicago, IL 60606

John F. Ward, Jr.  
Atty for ALTS  
O'Keef, Ashenden, Lyons & Ward  
30 N. LaSalle St., Suite 3040  
Chicago, IL 60602

Michael W. Ward  
Atty for Data Net Systems, L.L.C.  
Michael W. Ward P.C.  
1608 Barkley Blvd.,  
Buffalo Grove, IL 60089

Matthew L Harvey  
Office of General Counsel  
Illinois Commerce Commission  
160 N. LaSalle St., STE. C-800  
Chicago, IL 60601-3104

Margaret T Kelly  
Office of General Counsel  
Illinois Commerce Commission  
9th Floor  
160 N. LaSalle  
Chicago, IL 60601

Genevieve Morelli  
ATTY. FOR PACE COALITION  
Kelly Drye & Warren, LLP  
1200 19TH St., NW, STE. 500  
Washington, DC 20036

Aspasia A Paroutsas  
ATTY. FOR PACE COALITION  
Kelley Drye & Warren, LLP  
1200 19TH St., NW, 5TH FL.  
Washington, DC 20036

Service List ICC Docket No. 00-0700

Mary Stephenson  
Office of General Counsel  
Illinois Commerce Commission  
160 N. LaSalle St., STE. C-800  
Chicago, IL 60601-3104